

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

**McCABE, WEISBERG & CONWAY, LLC**

**By: Andrew M. Lubin, Esq. (Atty.**

**I.D.#AL0814)**

**216 Haddon Avenue, Suite 201**

**Westmont, NJ 08108**

**856-858-7080**

**Attorneys for Movant: LoanCare, LLC**

In Re:

Peter C Bell

Edna M Bell aka Edna M Jones aka Edna Jones  
Bell

Debtors

Case No.: 18-23437-MBK

Chapter: 13

Judge: Michael B. Kaplan

**CERTIFICATION RE POST-PETITION PAYMENT HISTORY  
( NOTE AND MORTGAGE DATED SEPTEMBER 3, 2015 )**

LINDA BROWN

of full age, employed as ASSISTANT SECRETARY

by LoanCare, LLC, hereby certifies the following information:

**BACKGROUND INFORMATION**

1. Recorded on September 21, 2015 in Ocean County, in Book 16193 at Page 481
2. Property Address: 8 Harrison Place, Township Of Manchester, New Jersey 08759
3. Mortgage Holder: LoanCare, LLC
4. Mortgagor(s)/Debtor(s): Peter C Bell and Edna M Bell aka Edna M Jones aka Edna Jones Bell.

POST-PETITION PAYMENTS (Petition filed on July 3, 2018)

Amount Due	Date payment Was Due	How Payment Was Applied (Mo./Yr)	Amount Received	Date Payment Received	Suspense
			\$844.09	10/05/18	\$844.09
1. \$1,093.06	08/01/18	08/01/18	\$1,517.60	10/24/18	\$1,268.63
2. \$1,093.06	09/01/18	09/01/18	SUSPENSE	10/24/18	\$175.57
3. \$1,093.06	10/01/18	10/01/18	\$1,517.60	11/17/18	\$600.11
4. \$1,093.06	11/01/18	11/01/18	\$999.99	11/19/18	\$507.04
5. \$1,093.06	12/01/18	12/01/18	\$999.99	11/19/18	\$413.97
			\$122.72	11/19/18	\$536.69
6. \$1,093.06	01/01/19	01/01/19	\$1,517.60	12/17/18	\$961.23
7. \$1,093.06	02/01/19	02/01/19	\$1,517.60	01/14/19	\$1,385.77
8. \$1,091.05	03/01/19	03/01/19	\$ 0.00	01/14/19	\$294.72

9. \$1,091.05	04/01/19	04/01/19	\$1,517.60	02/15/19	\$721.27
10. \$1,091.05	05/01/19	05/01/19	\$2,923.15	07/15/19	\$2,553.37
11. \$1,091.05	06/01/19	06/01/19	SUSPENSE	07/15/19	\$1,462.32
12. \$1,091.05	07/01/19	07/01/19	SUSPENSE	07/15/19	\$371.27
13. \$1,091.05	08/01/19	08/01/19	\$1,091.05	08/15/19	\$371.27
14. \$1,091.05	09/01/19	09/01/19	\$1,146.05	09/26/19	\$426.27
15. \$1,091.05	10/01/19	10/01/19	\$2,300.20	11/19/19	\$1,635.42
16. \$1,091.05	11/01/19	11/01/19	\$ 0.00	11/19/19	\$544.37
17. \$1,091.05	12/01/19	12/01/19	\$1,091.05	12/16/19	\$544.37
18. \$1,095.16	01/01/20	01/01/20	\$971.05	01/15/20	\$420.26
19. \$1,095.16	02/01/20	02/01/20	\$944.55	02/18/20	\$269.65
			\$798.05	03/13/20	\$1,067.70
20. \$1,095.16	03/01/20	03/01/20	\$63.54	06/23/20	\$36.08
21. \$1,095.16	04/01/20	04/01/20	\$1,108.46	07/22/20	\$49.38
			\$17.41	08/14/20	\$66.79
			\$163.86	10/20/20	\$230.65
			\$341.02	11/23/20	\$571.67
22. \$1,095.16	05/01/20	05/01/20	\$1,272.32	12/16/20	\$748.83
23. \$1,095.16	06/01/20	06/01/20	\$2,064.30	01/29/21	\$1,717.97
24. \$1,095.16	07/01/20	07/01/20	SUSPENSE	01/29/21	\$622.81
25. \$1,095.16	08/01/20	08/01/20	\$993.68	03/09/21	\$521.33
26. \$1,095.16	09/01/20	09/01/20	\$1,133.00	04/12/21	\$559.17
27. \$1,095.16	10/01/20	10/01/20	\$1,133.00	05/14/21	\$597.01
28. \$1,095.16	11/01/20	11/01/20	\$1,133.00	06/15/21	\$634.85
29. \$1,095.16	12/01/20	12/01/20	\$1,133.00	07/16/21	\$672.69
30. \$1,133.00	01/01/21	01/01/21	\$1,133.00	08/17/21	\$672.69
31. \$1,133.00	02/01/21	02/01/21	\$1,133.00	09/21/21	\$672.69
32. \$1,133.00	03/01/21	03/01/21	\$1,133.00	10/20/21	\$672.69
33. \$1,133.00	04/01/21	04/01/21	\$1,133.00	11/22/21	\$672.69
34. \$1,133.00	05/01/21	05/01/21	\$1,156.72	12/20/21	\$696.41
35. \$1,133.00	06/01/21	06/01/21	\$1,156.72	01/25/22	\$720.13
36. \$1,133.00	07/01/21	07/01/21	\$1,152.72	02/25/22	\$739.85
37. \$1,133.00	08/01/21	08/01/21	\$1,156.72	03/23/22	\$763.57
38. \$1,133.00	09/01/21	09/01/21	\$1,156.72	04/20/22	\$787.29
39. \$1,133.00	10/01/21	10/01/21	\$1,156.72	06/02/22	\$811.01
40. \$1,133.00	11/01/21	11/01/21	\$1,156.72	06/22/22	\$834.73
41. \$1,156.72	12/01/21	12/01/21	\$1,156.72	08/02/22	\$834.73
42. \$1,156.72	01/01/22	01/01/22	\$1,156.72	09/07/22	\$834.73
43. \$1,156.72	02/01/22	02/01/22	\$1,156.72	10/05/22	\$834.73
44. \$1,156.72	03/01/22	03/01/22	\$1,156.72	11/01/22	\$834.73
45. \$1,156.72	04/01/22		\$ 0.00	not received	\$834.73
46. \$1,156.72	05/01/22		\$ 0.00	not received	\$834.73
47. \$1,156.72	06/01/22		\$ 0.00	not received	\$834.73
48. \$1,156.72	07/01/22		\$ 0.00	not received	\$834.73
49. \$1,156.72	08/01/22		\$ 0.00	not received	\$834.73
50. \$1,156.72	09/01/22		\$ 0.00	not received	\$834.73
51. \$1,156.72	10/01/22		\$ 0.00	not received	\$834.73
52. \$1,206.07	11/01/22		\$ 0.00	not received	\$834.73
53. \$1,206.07	12/01/22		\$ 0.00	not received	\$834.73

54. \$1,206.07	01/01/23		\$ 0.00	not received	\$834.73
55. \$1,206.07	02/01/23		\$ 0.00	not received	\$834.73
56. \$1,206.07	03/01/23		\$ 0.00	not received	\$834.73
TOTAL: \$62,921.11			\$49,628.45		\$834.73

[Continue on attached sheets if necessary.]

Monthly payments past due: 7 mos. x \$1,156.72  
5 mos. x \$1,206.07

Less Suspense: \$834.73

(Monthly payment + less suspense) = \$13,292.66 as of March 1, 2023

Each current monthly payment is comprised of:

Principal/Interest..... \$617.12  
R.E. Taxes/Insurance... \$0.00  
Late Charges..... \$0.00  
Other..... \$588.95 (Specify: Escrow )  
TOTAL..... \$1,206.07

If the monthly payment amount has changed during the pendency of the case, please explain (attach separate sheet(s) if necessary): NOPC filed for payment change iao \$1,091.05 effective 03/01/2019;  
NOPC filed for payment change iao \$1,095.16 effective 01/01/2020; NOPC filed for payment change iao  
\$1,133.00 effective 01/01/2021; NOPC filed for payment change iao \$1,156.72; NOPC filed for payment  
change iao \$1,206.07 effective 11/01/2022.

PRE-PETITION ARREARS: \$24,412.05

I certify under penalty of perjury that the above is true.

3-16-23  
Date:

Linda Brown  
Signature

LoanCare, LLC.

LINDA BROWN

ASSISTANT SECRETARY

18-200941  
McCABE, WEISBERG & CONWAY, P.C.  
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Attorneys for Movant: LoanCare, LLC

UNITED STATES BANKRUPTCY COURT  
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Trenton Vicinage

IN RE:

Peter C Bell  
Edna M Bell aka Edna M Jones aka Edna  
Jones Bell  
Debtors

Case No.: 18-23437-MBK

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CERTIFICATION IN SUPPORT OF  
MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY

I, LINDA BROWN, do hereby certify:

1. I am a(n) ASSISTANT SECRETARY of LoanCare, LLC and I have complete knowledge of the amount due on the within obligation and mortgage and I am authorized to make this certification.
2. LoanCare, LLC is the holder of a mortgage on real property owned by the Debtors and located at 8 Harrison Place, Township Of Manchester, New Jersey 08759 ("Premises"), recorded in the Office of the Clerk of Ocean County.
3. The mortgage executed by the Debtors grants the Movant a lien on the Premises.
4. The Debtors have defaulted upon the note and mortgage as to post-petition payments.
5. Movant has not received payments on the note and it lacks adequate protection of its interest for the months of April 2022 through and including March 2023.
6. Since March 1, 2023, Movant has incurred attorney's fees in connection with this Motion.

7. The amount of the Debtors' monthly payment and the total post-petition arrears due and owing are provided on the attached Certification regarding the Post-Petition Payment History.

8. This certification is made in support of the Motion for Relief from the Automatic Stay so that Movant, LoanCare, LLC, may exercise all its rights under the applicable non-bankruptcy law and to move to protect its rights under the mortgage contract.

9. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: 3-16-23

Linda Brown  
Name:  
Title: ASSISTANT SECRETARY

LoanCare, LLC. LINDA BROWN